

**FILED**

OCT 06 2020

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk  
 U.S. DISTRICT COURT

<b>UNITED STATES OF AMERICA,</b>	)	Case No. <b><u>20CR218GKF</u></b>
	)	
<b>Plaintiff,</b>	)	<b><u>INDICTMENT</u></b>
	)	<b>[COUNT 1: 18 U.S.C. §§ 1151, 1153,</b>
<b>v.</b>	)	<b>and 2241(c) – Aggravated Sexual</b>
	)	<b>Abuse of a Child in Indian Country;</b>
<b>ROBERT WILLIAM PERRY, II,</b>	)	<b>COUNT 2: 18 U.S.C. §§ 1151, 1153,</b>
	)	<b>and 2244(a)(5) – Abusive Sexual</b>
<b>Defendant.</b>	)	<b>Contact of a Child in Indian Country]</b>

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. §§ 1151, 1153, and 2241(c)]**

From on or about May 6, 2017, to on or about May 15, 2018, within Indian Country in the Northern District of Oklahoma, the defendant, **ROBERT WILLIAM PERRY, II**, an Indian male, knowingly engaged in, and attempted to engage in, sexual acts with L.A., a minor who had not attained the age of 12 years, whose identity is known to the Grand Jury, including, but not limited to, by sexually touching and performing oral sex on L.A. with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2241(c).

**COUNT TWO**

**[18 U.S.C. §§ 1151, 1153, and 2244(a)(5)]**

From on or about May 6, 2017, to on or about May 15, 2018, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROBERT WILLIAM PERRY, II**, an Indian male, knowingly engaged in, and attempted to engage in, sexual contact, with L.A., a child who had not attained the age of 12 years, whose identity is known to the Grand Jury, including, but not limited to, by touching her genitalia and buttocks with the intent to abuse, humiliate, harass, degrade, and arouse and gratify his sexual desire.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2244(a)(5).

R. TRENT SHORES  
UNITED STATES ATTORNEY

A TRUE BILL

  
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D. EDWARD SNOW  
Assistant United States Attorney

/s/ Grand Jury Foreperson  
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Grand Jury Foreperson